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7 *Wal-Mart Stores, Inc.*

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 FE GABON DIMAKILING,

Case No.: 2:17-cv-01815-RFB-VCF

11 Plaintiff,

12 v.

13 WAL-MART STORES INC.; and DOES 1-20
14 and ROE BUSINESS ENTITIES 1-20,
inclusive,

STIPULATED PROTECTIVE ORDER
BETWEEN PLAINTIFF FE GABON
DIMAKILING AND DEFENDANT WAL-
MART STORES, INC.

15 Defendant.

16 **STIPULATED PROTECTIVE ORDER**

17 The parties to this action, Defendant Wal-Mart Stores, Inc. and Plaintiff, Fe Gabon
18 Dimakiling, by their respective counsel, hereby stipulate and request that the Court enter a stipulated
19 protective order as follows:

21 1. The Protective Order shall be entered pursuant to the Federal Rules of Civil Procedure
22 and applicable local rules for the United States District Court, District of Nevada

23 2. The Protective Order shall govern all materials identified as "Confidential" by the
24 parties. Disclosed materials claimed to be confidential in nature shall be produced by placing the
25 following legend on the face of each document and each page so designated "CONFIDENTIAL" or
26 otherwise expressly identified as confidential. The parties will use best efforts to limit the number of
27 documents designated as "Confidential." Confidential Information in this case shall include
28 documents designated as "Confidential."

1 Defendant's policies and procedures and training materials and maps/schematics of the subject
2 Walmart store.

3 3. Confidential Information shall be held in confidence by each party or his or her
4 representatives, attorneys, and agents for use solely for the purposes of this action and not for any
5 business purpose. Documents designated as confidential may not be disclosed to persons or parties
6 whose relationship to the dispute between the parties is not reasonably related to the prosecution or
7 defense of claims litigated.

8 4. Each counsel shall be responsible for providing notice of the Protective Order and the
9 terms therein to persons to whom they disclose "Confidential Information," as defined by the terms of
10 the Protective Order.

11 5. The parties will file under seal any Confidential Information included in any papers,
12 motions, or pleadings to avoid the public disclosure of said information.

13 6. The termination of this action shall not relieve the parties and persons obligated
14 hereunder from their responsibility to maintain the confidentiality of information designated
15 confidential pursuant to this Order.

16 7. After the final adjudication or resolution of this Lawsuit ("final adjudication" will
17 include the resolution of any appeals), a party may make a written demand to the other party for the
18 return of confidential materials, including all copies and reproductions thereof. The party receiving the
19 written demand shall have thirty (30) days from receipt of the written demand to comply with same.

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1 8. Nothing in the Protective Order shall be deemed to preclude any party from seeking
2 and obtaining, on an appropriate showing, a modification of this Order.

3 DATED this 5th day of October 2017.

4

5 DATED this 5th day of October 2017.

6 /s/ Garnet Beal

7 GARNET E. BEAL, ESQ.
8 Nevada Bar No. 12693
9 RICHARD HARRIS LAW FIRM
10 801 South Fourth Street
11 Las Vegas, NV 89101

12 *Attorneys for Plaintiff*
13 *Fe Gabon Dimakiling*

14 /s/ Ryan Kerbow

15 RYAN KERBOW
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20 *Attorneys for Defendant*
21 *Wal-Mart Stores, Inc.*

22 The terms of the above stipulation for a protective order by and between Defendant Wal-Mart
23 Stores, Inc. and Plaintiff Fe Gabon Dimakiling, by their respective counsel, shall hereby be the
24 ORDER of this Court.

25 DATED this 5th day of October, 2017



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27 UNITED STATES MAGISTRATE JUDGE
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